



Office of Hazardous Materials Enforcement

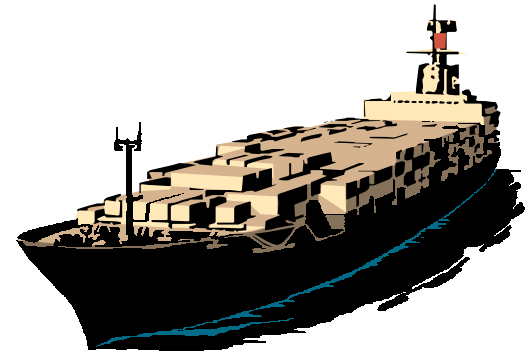
**Research and Special Programs
Administration**

U.S. Department of Transportation



A Presentation for
DOE
Society for Effective Lessons Learned
Sharing Workshop

October 18, 2000

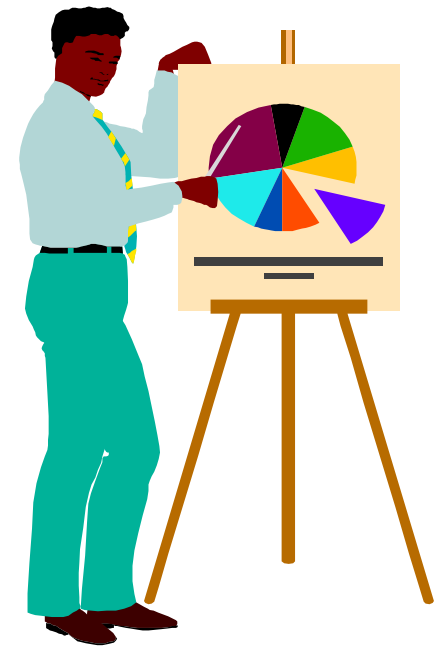




Presentation Overview



- **What We Do**
- **Lessons Learned**
 - **Type A Packaging**
- **Q&A's**
- **How to Reach RSPA**





Who We Are

- **Research and Special Programs Administration**
 - headquartered in Washington, DC
 - one of 11 DOT operating administrations
- **Associate Administrator for Hazmat Safety**
- **Office of Hazardous Materials Enforcement**
- **Director and Enforcement Officer**
 - special investigations office
 - five regional field offices



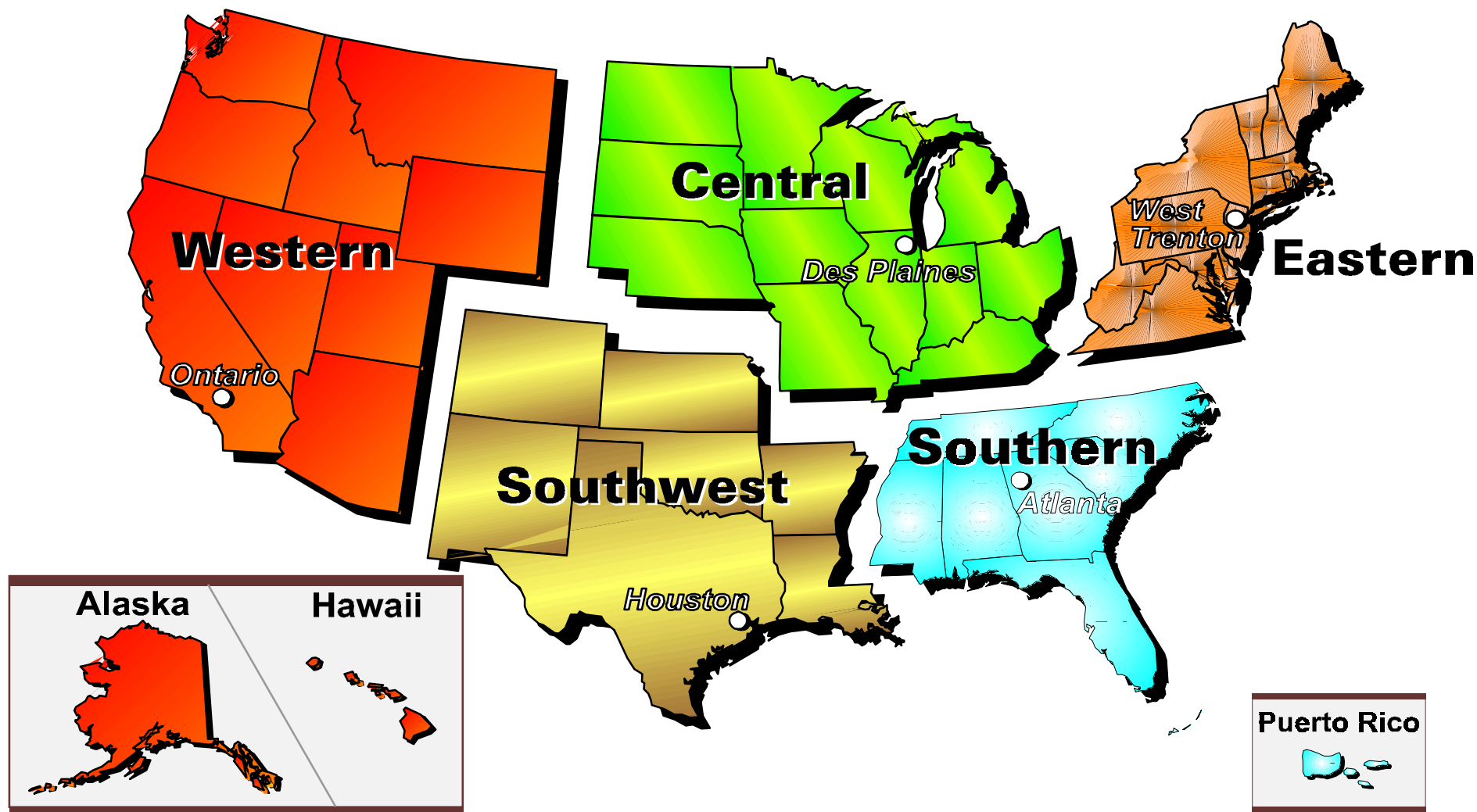


Special Investigations

- **Program Management**
 - **Radioactive Materials**
 - **Explosives and Reactive Materials**
 - **Intermediate Bulk Tanks**
 - **Compressed Gas Cylinders**



RSPA HAZMAT Enforcement Regional Offices





Regional Offices

- **region chief**
- **senior inspector**
- **four “generalist” field inspectors**
- **administrative assistant**





OHME Mission

- investigate hazmat accidents/incidents involving package failure.
- inspect hazmat shippers and non-bulk packaging manufacturers.





OHME Program Statistics

FY-1999

- **257 Notices of Probable Violation issued**
 - 45 to packaging manufacturers
 - 47 to packaging retesters
 - 9 to drum reconditioners
 - 7 to fiberboard box manufacturer/shippers
 - 149 to shippers
- **\$1,734,511 Total Penalties Collected**





Lessons Learned



■ Type A Packaging

■ Failure to properly conduct Type A tests.

Incorrect stacking test weight

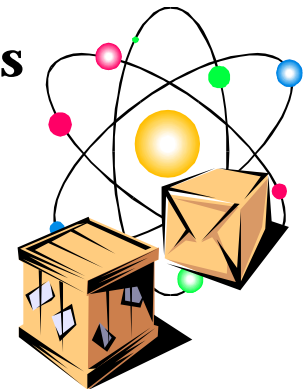
Not completing additional tests for liquid or gas contents

■ Failure to maintain design in accordance with Type A test documentation.

Missing or modified inner packaging components

Additional shielding not part of tested design

Changes to method of closure





Lessons Learned



- **Type A Packaging (continued)**
 - **Failure to ensure Type A package incorporates a feature, such as a seal, to provide evidence that the package has not been opened.**
 - **Failure to maintain Type A test documentation for reuse/reshipment of vendor supplied Type A packaging.**



■ **Transportation of QC Water Samples**

Trip blanks and field blanks are routinely sent to off-site laboratories along with soil samples for quality control purposes. The blanks consist of DI water preserved with either HCL or HNO₃ to a pH of approximately 2. Trip blanks are typically 40 mL vials of water preserved with HNO₃. Have any studies been done with these types of samples to show if they meet the DOT definition of Class 8 Material? Are there any exemptions that would apply to these types of samples?



■ Field Screening of Potentially Radioactive Soil

At a number of characterization sites, information on the amount and types of radionuclides remaining in soil is extremely limited. To determine if soil samples shipped for off-site radiological analysis meet the definition of Class 7 Material, field screening results with an NE Technology Electra (dpm/100 cm²) have been conservatively converted into specific activity units (pCi/g) in order to compare against the regulatory limits. This has been found to be an inexpensive and quick solution to the classification of unknown soils. Is there any guidance on other techniques that may be used in the field or guidance on conversions formulas?



Q&A's

■ **Dry Active Waste – LSA, SCO, or Nonregulated**

Because it is difficult to establish surface contamination levels on dry active wastes (DAW) shippers are allowed to handle such material as LSA material with the assumption that the radioactivity is “distributed throughout.” An uncertainty arises when the activity is measured and assigned to the material and it is determined that the activity to mass ratio is less than the 70 Bq/g threshold to be considered Class 7 material. Can the material be considered unregulated material or do surface contamination levels then need to be established to determine the regulatory status, possibly as a SCO material? Or can the material still be shipped as LSA even if the activity:mass ratio is less than 70 Bq/g?



Q&A's

- **Under what circumstance can materials be shipped that do not meet DOT regulations?**



Q&A's

- **What should be done with shipments with serious discrepancies in the paperwork?**



Q&A's

- **What should be done with a shipment with serious paperwork discrepancies and that greatly exceeds allowable radiation levels?**



How To Reach Us



Hazardous Materials

INFO-LINE

1-800-HMR49-22

(1-800-467-4922)

FAX:

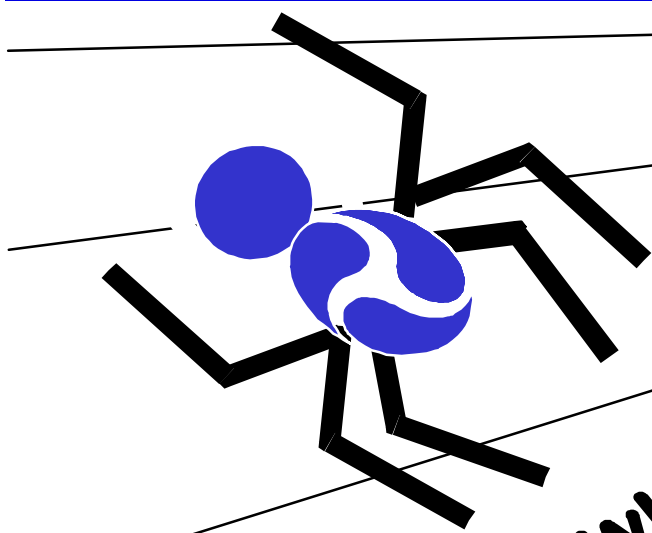
(202) 366-7342

E-Mail:

TRAINING@rspa.dot.gov



HAZMAT Safety on the Web



Have you crawled our web yet?

<http://hazmat.dot.gov>



<http://hazmat.dot.gov>

Welcome to HAZMAT SAFETY...



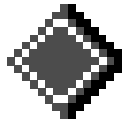
DOT's Office of Hazardous Materials Safety



Rules & Regulations

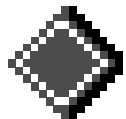


The Office of Hazardous Materials Safety



49 CFR Parts 100-185, DOT Exemptions and Interpretations

- Title 49 Code of Federal Regulations, Parts 100 - 185;
- Office of Hazardous Materials Safety Exemptions from the HMR; and
- Office of Hazardous Materials Safety Letters of Interpretation (Clarifications) of the HMR.



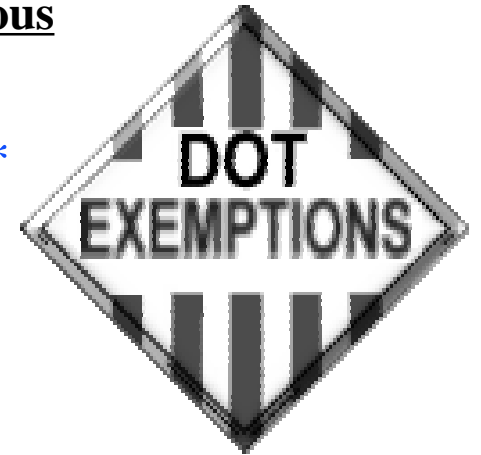
Rulemakings and Federal Register Notices



Rules & Regulations

Exemptions to the Hazardous Materials Regulations

*** IMPORTANT ***



Exemptions 0-2999



Exemptions 3000 - 3999



Exemptions 4000 - 4999



Exemptions 5000 - 5999



Exemptions 6000 - 6999



Exemptions 7000 - 7999



Exemptions 8000 - 8999



Exemptions 9000 - 9999



Exemptions 10000 - 10999



Exemptions 11000 - 11999

Exemptions 12000 - 12999

The Exemptions presented here are NOT all inclusive! RSPA is updating this listing. If you have specific questions concerning a particular Exemption or you need the most current revision you should contact:

U.S. DOT/RSPA Public Dockets
(202) 366-5046



When You Need Us



Michele Sampson

Radioactive Materials

Enforcement Program Manager

U.S. Department of Transportation

Research and Special Programs Administration

Office of Hazardous Materials Enforcement

400 Seventh Street S.W., Room 8436

Washington, D.C. 20590

michele.sampson@rspa.dot.gov

PHONE (202) 366-4700

FAX (202) 366-2784